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Attorneys for Petitioner Magnus Löfving as  
Administrator of Debtor Go North Group  
AB

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

GO NORTH GROUP AB,

Debtor in a Foreign Proceeding.

Case No. 24-11598 (MEW)

Chapter 15

**EX PARTE MOTION TO SHORTEN TIME**

Petitioner Magnus Löfving, the duly appointed administrator (“Petitioner”) of the above-named debtor Go North Group AB (“Debtor”), which commenced a restructuring proceeding in and was brought under supervision of the District Court of Gothenburg, Sweden (“Swedish Proceeding”), makes this motion to shorten the notice period with respect to his *Emergency Motion for Provisional Relief* (“§ 1519 Motion”), made primarily to stay an arbitration proceeding brought by creditor BSB Industries, LLC (“BSB”), and schedule an emergency hearing thereon, and states:

1. As described in the § 1519 Motion, provisional relief is needed to preserve the status quo pending the hearing to consider the petition for recognition.
2. Cause exists under FRBP 9006(c)(1) to shorten the applicable notice period in light of the fact that the return date of BSB’s emergency motion for an award directing the return of the business it previously sold to the Debtor is September 18, 2024. (Chubak Aff. Exhibit 2.)
3. If the Court does not shorten notice, the Debtor will be forced to expend resources defending the arbitration, there is significant risk of an adverse award and the Debtor having to

expend resources responding to enforcement activity, with management needlessly distracted while its focus is properly on reorganization efforts. *See generally In re Gercke*, 122 B.R. 621, 626 (Bankr. D.D.C. 1991) (expending resources on non-bankruptcy litigation “would constitute a diversion of funds needed for the purpose of maximizing value” and which “would constitute irreparable harm”).

4. For these reasons, the Court should schedule a hearing on the § 1519 Motion at the Court’s earliest convenience.

5. Petitioner asks that the Court grant this motion without notice to third parties. Notice of the signed order will be served as provided in the order entered hereon.

6. No prior request for the relief sought in this motion has previously been made to this Court or to any other court.

WHEREFORE, the Court should shorten the notice period with respect to the § 1519 Motion and schedule an emergency hearing thereon, and grant such other and further relief as the Court deems just and proper.

Dated: New York, NY  
September 16, 2024

Amini LLC

/s/ Jeffrey Chubak  
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